

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v. - :

SUPERSEDING INFORMATION

CESAR ALTIERI SAYOC, : S1 18 Cr. 820 (JSR)

a/k/a "Cesar Randazzo," :

a/k/a "Cesar Altieri," :

a/k/a "Cesar Altieri Randazzo," :

Defendant. :

- - - - - x

COUNT ONE

(Use of a Weapon of Mass Destruction)

The United States Attorney charges:

1. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects

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DATE FILED: MAR 21 2019

interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense, and the results of the offense, affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to George Soros in Katonah, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT TWO
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

2. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in

interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Hillary Clinton in Chappaqua, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT THREE
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

3. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in

furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to John Brennan in Manhattan, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT FOUR
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

4. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail

and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Robert De Niro in Manhattan, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT FIVE
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

5. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against

persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to James Clapper in Manhattan, New York.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT SIX
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

6. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a

destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Barack Obama in Washington, D.C.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT SEVEN
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

7. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting

without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Maxine Waters in Washington, D.C.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT EIGHT
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

8. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere,

CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Eric Holder in Washington, D.C.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT NINE
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

9. In or about October 2018, in the Southern District of Florida, the Central District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Maxine Waters in Los

Angeles, California.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT TEN
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

10. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims

across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Joseph Biden Jr. in Wilmington, Delaware.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT ELEVEN
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

11. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign

commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida a second improvised explosive device addressed to Joseph Biden Jr. at a second address in Wilmington, Delaware.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT TWELVE
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

12. In or about October 2018, in the Southern District of Florida, the District of New Jersey, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the

offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Cory Booker at an address in Camden, New Jersey.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT THIRTEEN
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

13. In or about October 2018, in the Southern District of Florida, the Eastern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921-- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce,

(c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Kamala Harris at an address in Sacramento, California.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT FOURTEEN
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

14. In or about October 2018, in the Southern District of Florida, the Northern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense,

(b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to Thomas Steyer in San Francisco, California.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT FIFTEEN
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

15. In or about October 2018, in the Southern District of Florida, the Northern District of Georgia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction -- namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within

the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida an improvised explosive device addressed to CNN at an address in Atlanta, Georgia.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT SIXTEEN
(Use of a Weapon of Mass Destruction)

The United States Attorney further charges:

16. In or about October 2018, in the Southern District of Florida, the Northern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, acting without lawful authority, knowingly used, attempted to use, and threatened to use, a weapon of mass destruction --

namely, a destructive device as defined by Title 18, United States Code, Section 921 -- against persons and property within the United States, and (a) the mail and facilities of interstate and foreign commerce were used in furtherance of the offense, (b) such property was used in interstate and foreign commerce and in an activity that affects interstate and foreign commerce, (c) SAYOC traveled in and caused another to travel in interstate and foreign commerce in furtherance of the offense, and (d) the offense and the results of the offense affected interstate and foreign commerce, and would have affected interstate and foreign commerce, to wit, in connection with SAYOC's mailing of 16 improvised explosive devices via U.S. mail to various victims across the United States, SAYOC mailed from Florida a second improvised explosive device addressed to Thomas Steyer at a second address in San Francisco, California.

(Title 18, United States Code, Sections 2332a(a)(2) and 2.)

COUNT SEVENTEEN
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

17. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received,

and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to George Soros in Katonah, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT EIGHTEEN
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

18. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Hillary Clinton in Chappaqua, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT NINETEEN

(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

19. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate an individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to John Brennan in Manhattan, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY

(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

20. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent

that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Robert De Niro in Manhattan, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-ONE
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

21. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to James Clapper in Manhattan, New York.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-TWO
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

22. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Barack Obama in Washington, D.C.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-THREE
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

23. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive

with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Maxine Waters in Washington, D.C.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-FOUR
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

24. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Eric Holder in Washington, D.C.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-FIVE
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

25. In or about October 2018, in the Southern District of Florida, the Central District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Maxine Waters in Los Angeles, California.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-SIX
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

26. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport

and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Joseph Biden Jr. in Wilmington, Delaware.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-SEVEN
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

27. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida a second improvised

explosive device addressed to Joseph Biden Jr. at a second address in Wilmington, Delaware.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-EIGHT
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

28. In or about October 2018, in the Southern District of Florida, the District of New Jersey, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Cory Booker at an address in Camden, New Jersey.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT TWENTY-NINE
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

29. In or about October 2018, in the Southern District of Florida, the Eastern District of California, and

elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Kamala Harris at an address in Sacramento, California.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT THIRTY
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

30. In or about October 2018, in the Southern District of Florida, the Northern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal

property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to Thomas Steyer in San Francisco, California.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT THIRTY-ONE
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

31. In or about October 2018, in the Southern District of Florida, the Northern District of Georgia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida an improvised explosive device addressed to CNN at an address in Atlanta, Georgia.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT THIRTY-TWO
(Interstate Transportation and Receipt of Explosives)

The United States Attorney further charges:

32. In or about October 2018, in the Southern District of Florida, the Northern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transported and received, and attempted to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy a building, vehicle, and other real and personal property, to wit, SAYOC mailed from Florida a second improvised explosive device addressed to Thomas Steyer at a second address in San Francisco, California.

(Title 18, United States Code, Sections 844(d) and 2.)

COUNT THIRTY-THREE
(Threatening Interstate Communications)

The United States Attorney further charges:

33. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate

and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts One and Seventeen of this Superseding Information to George Soros in Katonah, New York, which mailing also contained a print-out including the word "Soros" marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT THIRTY-FOUR
(Threatening Interstate Communications)

The United States Attorney further charges:

34. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Two and Eighteen of this Superseding Information to Hillary Clinton in Chappaqua, New York, which mailing also contained a photograph of Clinton and members of her family marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT THIRTY-FIVE
(Threatening Interstate Communications)

The United States Attorney further charges:

35. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Three and Nineteen of this Superseding Information to John Brennan in Manhattan, New York, which mailing also contained a photograph of Brennan marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT THIRTY-SIX
(Threatening Interstate Communications)

The United States Attorney further charges:

36. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida

the improvised explosive device described in Counts Four and Twenty of this Superseding Information to Robert De Niro in Manhattan, New York, which mailing also contained a photograph of De Niro marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT THIRTY-SEVEN
(Threatening Interstate Communications)

The United States Attorney further charges:

37. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Five and Twenty-One of this Superseding Information to James Clapper in Manhattan, New York, which mailing also contained a photograph of Clapper marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT THIRTY-EIGHT
(Threatening Interstate Communications)

The United States Attorney further charges:

38. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Six and Twenty-Two of this Superseding Information to Barack Obama in Washington, D.C., which mailing also contained a photograph of Obama marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT THIRTY-NINE
(Threatening Interstate Communications)

The United States Attorney further charges:

39. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a

communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Seven and Twenty-Three of this Superseding Information to Maxine Waters in Washington, D.C., which mailing also contained a photograph of Waters marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY
(Threatening Interstate Communications)

The United States Attorney further charges:

40. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Eight and Twenty-Four of this Superseding Information to Eric Holder in Washington, D.C., which mailing also contained a photograph of Holder marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-ONE
(Threatening Interstate Communications)

The United States Attorney further charges:

41. In or about October 2018, in the Southern District of Florida, the Central District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Nine and Twenty-Five of this Superseding Information to Maxine Waters in Los Angeles, California, which mailing also contained a photograph of Waters marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-TWO
(Threatening Interstate Communications)

The United States Attorney further charges:

42. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a

communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Ten and Twenty-Six of this Superseding Information to Joseph Biden Jr. in Wilmington, Delaware, which mailing also contained a photograph of Biden marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-THREE
(Threatening Interstate Communications)

The United States Attorney further charges:

43. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Eleven and Twenty-Seven of this Superseding Information to Joseph Biden Jr. in Wilmington, Delaware, which mailing also contained a photograph of Biden marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-FOUR
(Threatening Interstate Communications)

The United States Attorney further charges:

44. In or about October 2018, in the Southern District of Florida, the District of New Jersey, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Twelve and Twenty-Eight of this Superseding Information to Cory Booker in Camden, New Jersey, which mailing also contained a photograph of Booker marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-FIVE
(Threatening Interstate Communications)

The United States Attorney further charges:

45. In or about October 2018, in the Southern District of Florida, the Eastern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a

communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Thirteen and Twenty-Nine of this Superseding Information to Kamala Harris in Sacramento, California, which mailing also contained a photograph of Harris marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-SIX
(Threatening Interstate Communications)

The United States Attorney further charges:

46. In or about October 2018, in the Southern District of Florida, the Northern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Fourteen and Thirty of this Superseding Information to Thomas Steyer in San Francisco, California, which mailing also contained a photograph of Steyer marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-SEVEN

(Threatening Interstate Communications)

The United States Attorney further charges:

47. In or about October 2018, in the Southern District of Florida, the Northern District of Georgia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Fifteen and Thirty-One of this Superseding Information to CNN in Atlanta, Georgia, which mailing also contained a printed CNN logo marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-EIGHT

(Threatening Interstate Communications)

The United States Attorney further charges:

48. In or about October 2018, in the Southern District of Florida, the Northern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of

another, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Sixteen and Thirty-Two of this Superseding Information to Thomas Steyer in San Francisco, California, which mailing also contained a photograph of Steyer marked with a red "X."

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT FORTY-NINE
(Illegal Mailing of Explosives)

The United States Attorney further charges:

49. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another, and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts One, Seventeen, and Thirty-Three of this

Superseding Information, which was addressed to George Soros in Katonah, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY
(Illegal Mailing of Explosives)

The United States Attorney further charges:

50. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Two, Eighteen, and Thirty-Four of this Superseding Information, which was addressed to Hillary Clinton in Chappaqua, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-ONE
(Illegal Mailing of Explosives)

The United States Attorney further charges:

51. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Three, Nineteen, and Thirty-Five of this Superseding Information, which was addressed to John Brennan in Manhattan, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-TWO
(Illegal Mailing of Explosives)

The United States Attorney further charges:

52. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a

"Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be delivered by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Four, Twenty, and Thirty-Six of this Superseding Information, which was addressed to Robert De Niro in Manhattan, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-THREE
(Illegal Mailing of Explosives)

The United States Attorney further charges:

53. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was

addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Five, Twenty-One, and Thirty-Seven of this Superseding Information, which was addressed to James Clapper in Manhattan, New York.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-FOUR
(Illegal Mailing of Explosives)

The United States Attorney further charges:

54. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Six, Twenty-Two,

and Thirty-Eight of this Superseding Information, which was addressed to Barack Obama in Washington, D.C.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-FIVE
(Illegal Mailing of Explosives)

The United States Attorney further charges:

55. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Seven, Twenty-Three, and Thirty-Nine of this Superseding Information, which was addressed to Maxine Waters in Washington, D.C.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-SIX
(Illegal Mailing of Explosives)

The United States Attorney further charges:

56. In or about October 2018, in the Southern District of Florida, the District of Columbia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Eight, Twenty-Four, and Forty of this Superseding Information, which was addressed to Eric Holder in Washington, D.C.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-SEVEN
(Illegal Mailing of Explosives)

The United States Attorney further charges:

57. In or about October 2018, in the Southern District of Florida, the Central District of California, and

elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Nine, Twenty-Five, and Forty-One of this Superseding Information, which was addressed to Maxine Waters in Los Angeles, California.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-EIGHT
(Illegal Mailing of Explosives)

The United States Attorney further charges:

58. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received

by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Ten, Twenty-Six, and Forty-Two of this Superseding Information, which was addressed to Joseph Biden Jr. in Wilmington, Delaware.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT FIFTY-NINE
(Illegal Mailing of Explosives)

The United States Attorney further charges:

59. In or about October 2018, in the Southern District of Florida, the District of Delaware, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Eleven, Twenty-

Seven, and Forty-Three of this Superseding Information, which was addressed to Joseph Biden Jr. in Wilmington, Delaware.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT SIXTY
(Illegal Mailing of Explosives)

The United States Attorney further charges:

60. In or about October 2018, in the Southern District of Florida, the District of New Jersey, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Twelve, Twenty-Eight, and Forty-Four of this Superseding Information, which was addressed to Cory Booker in Camden, New Jersey.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT SIXTY-ONE
(Illegal Mailing of Explosives)

The United States Attorney further charges:

61. In or about October 2018, in the Southern District of Florida, the Eastern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Thirteen, Twenty-Nine, and Forty-Five of this Superseding Information, which was addressed to Kamala Harris in Sacramento, California.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT SIXTY-TWO
(Illegal Mailing of Explosives)

The United States Attorney further charges:

62. In or about October 2018, in the Southern District of Florida, the Northern District of California, and

elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Fourteen, Thirty, and Forty-Six of this Superseding Information, which was addressed to Thomas Steyer in San Francisco, California.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT SIXTY-THREE
(Illegal Mailing of Explosives)

The United States Attorney further charges:

63. In or about October 2018, in the Southern District of Florida, the Northern District of Georgia, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received

by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Fifteen, Thirty-One, and Forty-Seven of this Superseding Information, which was addressed to CNN in Atlanta, Georgia.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT SIXTY-FOUR
(Illegal Mailing of Explosives)

The United States Attorney further charges:

64. In or about October 2018, in the Southern District of Florida, the Northern District of California, and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly deposited for mailing and delivery, and knowingly caused to be delivered by mail, according to the direction thereon, and at a place at which it was directed to be received by the person to whom it was addressed, a thing declared nonmailable as defined in Title 18, United States Code, Section 1716(a), with intent to kill and injure another and injure the mails and other property, to wit, SAYOC mailed from Florida the improvised explosive device described in Counts Sixteen, Thirty-

Two, and Forty-Eight of this Superseding Information, which was addressed to Thomas Steyer in San Francisco, California.

(Title 18, United States Code, Sections 1716(j)(2) and 2.)

COUNT SIXTY-FIVE
(Use of Explosives to Commit a Felony)

The United States Attorney further charges:

65. In or about October 2018, in the Southern District of New York and elsewhere, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, knowingly used an explosive -- to wit, the explosive powder packed inside the improvised explosive devices described in Counts One through Sixty-Four of this Superseding Information -- to commit felonies which may be prosecuted in a court of the United States -- to wit, the offenses charged in Counts One through Sixty-Four of this Superseding Information -- and knowingly carried such explosive during the commission of such felonies.

(Title 18, United States Code, Sections 844(h) and 2.)

FORFEITURE ALLEGATIONS

66. As a result of committing the offenses alleged in Counts One through Sixteen of this Superseding Information, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, shall

forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offenses; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offenses; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offenses, including but not limited to a sum of money in United States currency representing the total amount of the defendant's assets.

67. As a result of committing the offenses alleged in Counts One through Forty-Eight and Count Sixty-Five of this Superseding Information, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency

representing the amount of proceeds traceable to the commission of said offenses.

68. As a result of committing the offenses alleged in Counts Seventeen through Thirty-Two and Count Sixty-Five of this Superseding Information, CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 844(c) and 982(a)(2)(B), and Title 28, United States Code, Section 2461, (i) any and all explosive materials involved or used or intended to be used in said offenses, and (ii) any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said offenses, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses.

Substitute Assets Provision

69. If any of the above-described forfeitable property, as a result of any act or omission of CESAR ALTIERI SAYOC, a/k/a "Cesar Randazzo," a/k/a "Cesar Altieri," a/k/a "Cesar Altieri Randazzo," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;


c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 844, 981 and 982; Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CESAR ALTIERI SAYOC,
a/k/a "Cesar Randazzo,"
a/k/a "Cesar Altieri,"
a/k/a "Cesar Altieri Randazzo,"

Defendant.

SUPERSEDING INFORMATION

S1 18 Cr. 820 (JSR)

(18 U.S.C. §§ 844(d), 844(h), 875(c),
1716(j)(2), 2332a(a)(2), and 2.)

GEOFFREY S. BERMAN
United States Attorney.
